

From: "Wood, Evan (ECY)" <ewoo461@ECY.WA.GOV>
To: "Peterson, Piper" <Peterson.Piper@epa.gov>
Date: 11/2/2022 10:50:46 AM
Subject: Re: South Tacoma Channel South Tacoma Field Permitting

Yes the cell number below will work or we can set up a teams call so I can share my screen and we can look at the same thing.

Evan Wood (He/Him)

Contaminated Construction Stormwater Inspector
Department of Ecology | SW Regional Office | Water Quality Program
(b) (6) cell | Email ewoo461@ecy.wa.gov

From: Peterson, Piper <Peterson.Piper@epa.gov>
Sent: Wednesday, November 2, 2022 10:49 AM
To: Wood, Evan (ECY) <ewoo461@ECY.WA.GOV>
Subject: RE: South Tacoma Channel South Tacoma Field Permitting

Should I call the cell number below?



Piper Peterson
(She/Her/Hers)
US Environmental Protection Agency R10
Superfund Emergency Mgm't Division
1200 Sixth Avenue, Suite 155, M/S **12-D12-1**
Seattle, Washington 98101-3188
(206) 553-4951
peterson.piper@epa.gov

Strength Finders-Winning Others Over
(WOO), Communication, Strategic,
Ideation, Positivity;
DiSC – Di; Meyers-Briggs: ESTJ

From: Wood, Evan (ECY) <ewoo461@ECY.WA.GOV>
Sent: Wednesday, November 02, 2022 10:49 AM
To: Peterson, Piper <Peterson.Piper@epa.gov>
Subject: Re: South Tacoma Channel South Tacoma Field Permitting

I am available at 11 as well! I have meetings after lunch so 11 will work best. Thank you for the quick reply.

Evan Wood (He/Him)

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From: Peterson, Piper <Peterson.Piper@epa.gov>
Sent: Wednesday, November 2, 2022 10:47 AM

To: Wood, Evan (ECY) <ewoo461@ECY.WA.GOV>
Cc: Marcoe, Sheila (ECY) <smar461@ECY.WA.GOV>
Subject: RE: South Tacoma Channel South Tacoma Field Permitting

I don't believe so, but let's talk to be sure we are talking about the same thing. I am available between 11-2 today. Let me know what time works best and I can give you a call.
Piper



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From: Wood, Evan (ECY) <ewoo461@ECY.WA.GOV>
Sent: Wednesday, November 02, 2022 10:45 AM
To: Peterson, Piper <Peterson.Piper@epa.gov>
Cc: Marcoe, Sheila (ECY) <smar461@ECY.WA.GOV>
Subject: Re: South Tacoma Channel South Tacoma Field Permitting

Piper,

I am nearing completion of my contaminated review of the Bridge Industrial project and I have a quick question.

Part of their plan calls for some excavation underneath building A. The problem is that building A is on top of some of the capped soils. See attachment C of the attached Technical Memo. Will there be any issues with them excavating in the capped soils and using the excavated soils as surface fill? I believe the plan is to place these soils under building B. Let me know if you have any other concerns about us covering this project under the construction stormwater general permit.

Thank you,

Evan Wood (He/Him)
Contaminated Construction Stormwater Inspector
Department of Ecology | SW Regional Office | Water Quality Program
(b) (6) cell | Email ewoo461@ecy.wa.gov

From: Peterson, Piper <Peterson.Piper@epa.gov>
Sent: Wednesday, June 29, 2022 5:44 PM
To: Wood, Evan (ECY) <ewoo461@ECY.WA.GOV>
Cc: Marcoe, Sheila (ECY) <smar461@ECY.WA.GOV>; Adams, Shannon (ECY) <SPET461@ECY.WA.GOV>; McCauley, Margaret <McCauley.Margaret@epa.gov>; Bitalac, Emily <Bitalac.Emily@epa.gov>
Subject: RE: South Tacoma Channel South Tacoma Field Permitting

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM - Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link

Thanks for reaching out regarding the Commencement Bay/South Tacoma Channel Superfund Site, specifically regarding South Tacoma Field Operable Unit (OU) 4. Attached are 1) the Final Soil Management Plan in the event the redevelopment company moves the soils on site to under the buildings as you state below and 2) the 2018 Five Year Review required when contaminated material is left on a Superfund Site (the next one is due June 2023). I haven't seen any additional plan from the developer since this one. On a recent call, they made a statement that "they were not allowed to remove these contaminated soils off site." I let them know that they was not true; and while I don't expect that they will change their current plans for on-site placement of these soils under the buildings they want to place here, it was something they could do if this element of their cleanup became problematical with the community or permitting agencies. The role of Superfund is to ensure the protectiveness of the cleanup remedy. Placing contaminated under buildings, or removing them entirely from the site, would be more protective than the selected remedy. But there isn't anything preventing them from being more protective during the course of their redevelopment activities.

I believe it is their intent to remove more than 1 foot of soils. See the Soils Management Plan (SMP) for details and note that the final design for the future of this site was not complete at the time this plan was developed so if there is more recent information the company has submitted for your review, I would rely on that. One foot of material over the "treated and consolidated soils" and the "consolidated soils" serve as a protective cover again human contact, erosion and wind dispersion. It is sometimes referred to as a "cap," however, typically caps are up to 3 feet thick and prevent surface water infiltration.

In the 2nd attachment, find Tables 3-4 (pdf page 43 of 86) for the complete list of contaminants of concern (COCs) addressed during the cleanup and the different cleanup levels depending on the concentrations of these contaminants. A description of the implemented remedy for the South Tacoma Field soils is highlighted on pdf page 45 of 86.

It is my understanding that approximately 98% of the area will be covered by buildings, asphalt and concrete for roadways, rights of way and parking. There may be some clean soil brought to the site for vegetation in parking strips, etc. My recollection is this is discussed in the Soil Management Plan as well. Any import soils shall meet the criteria in Section 3.11 of the SMP. Erosion and sediment control is discussed in Section 3.3 and Clearing and Grubbing is in Section 3.7. EPA provided the following comment regarding Section 3.7 and expect this to be submitted before work begins – "Section 3.7.1. When the contractor has a plan for scraping, staging, consolidating/backfilling the site soils, submit it to EPA for review before any work begins. Currently it is not clear how this will be done and how much of the treated and impacted soils are scraped off and consolidated under Buildings A or B and which scraped soils are then covered with concrete or asphalt parking lots or roadways. This plan shall identify any different means, methods, or sequencing that will be used in the treated soils." If you would like a copy of EPA's comment letter, let me know.

I am not a stormwater expert, but I believe if they follow the typical construction stormwater requirements, and oversight is conducted to ensure that these measures are in place and being performed adequately, I wouldn't expect there to be any environmental harm in the form of stormwater infiltration or runoff or wind dispersion (e.g., minimizing and/or covering soil piles, berming piles with ecology blocks and minimizing the duration that soils are temporarily stored on site, the preference would be to "ready" the location for these soils first and then move the soils such that the removal and receiving locations can be adequately controlled regarding impacts from water or wind, blocking access to any storm drains in this area, management of on-site water from precipitation, dust control, other, etc.) These types of considerations are identified in the Soil Management Plan.

As their development plans become more concrete, there are additional plans which EPA has asked to be submitted for review.

If you have additional questions or concerns, please email me or we can set up a meeting to discuss this further.

Sincerely,
Piper Peterson



Piper Peterson
(She/Her/Hers)
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Superfund Emergency Mgmt Division
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From: Wood, Evan (ECY) <ewoo461@ECY.WA.GOV>
Sent: Wednesday, June 29, 2022 5:00 PM
To: Peterson, Piper <Peterson.Piper@epa.gov>
Cc: Marcoe, Sheila (ECY) <smar461@ECY.WA.GOV>; Adams, Shannon (ECY) <SPET461@ECY.WA.GOV>
Subject: South Tacoma Channel South Tacoma Field Permitting

Good Afternoon Piper,

My name is Evan Wood and I work for the Washington State Department of Ecology as a Construction Stormwater Inspector. We are working through the process to issue a Construction Stormwater General Permit for an industrial warehouse facility that is planned to be built on the South Tacoma Field of the Commencement Bay South Tacoma Channel Superfund Site. We also plan on issuing an Administrative Order to ensure that water quality standards will not be violated during construction.

It is our understanding that the permittee plans on scraping the top one foot of soils on the site, piling the excavated materials under the location of one of their warehouses and capping the site with clean soils, asphalt and concrete. Does this plan sound reasonable and/or practical for this superfund site?

As far as we know the contaminants of concern for this project are lead and arsenic. Are you aware of any additional contaminants that we should be concerned about and include in our Order? Also, do you know of anything else that we should consider about this site and should review before we move forward with issuing our permit?

Let me know if you have any questions or any additional insight to this site.

Thank you,

Evan Wood (He/Him)
Construction Stormwater Inspector
Department of Ecology | SW Regional Office | Water Quality Program
(b) (6) cell | Email ewoo461@ecy.wa.gov

